

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Jennifer EDWARDS

Case: 2:23-mj-30108

Assigned To : Unassigned

Assign. Date : 3/14/2023

CMP: SEALED MATTER (MAW)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 9, 2022 in the county of Wayne in the  
Eastern District of Michigan SD, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 841(a)(1)

21 U.S.C. . § 846

18 U.S.C §1716

Possession with Intent to Distribute Controlled Substances

Conspiracy with the Intent to Distribute Controlled Substances

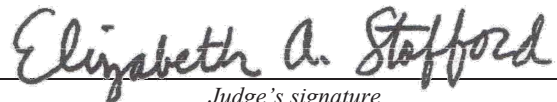
Mailing Injurious Articles

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☐ Continued on the attached sheet.*Complainant's signature*

Insp. Christopher G. Bradshaw, Postal Inspector, USPS

*Printed name and title*Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: March 14, 2023City and state: Detroit, Michigan*Judge's signature*

Hon. Elizabeth Stafford, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Christopher G. Bradshaw, being duly sworn on oath, state as follows:

INTRODUCTION

1. I am a United States Postal Inspector assigned to the Allen Park Domicile of the Detroit Division of the U.S. Postal Inspection Service (USPIS). I am sworn and empowered to investigate criminal activity involving or relating to the U.S. Postal Service. I am assigned to investigate the unlawful transportation of contraband, including Title 21 controlled substances, through the United States Mail. I have been a Postal Inspector since June 2013. I attended the United States Postal Inspection Service Basic Training Academy where I have received training in the detection and investigation of prohibited mailing offenses. As part of my duties, I investigate incidents wherein the United States mail system is used for the purpose of transporting non-mailable matter, including controlled substances such as marijuana, cocaine, methamphetamine, and heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 846, 843(b), and substances mailed in violation of Title 18, United States Code, Section 1716.

2. This Affidavit is made in support of an application for a criminal complaint and warrant to arrest Jennifer EDWARDS (AKA: Jennifer Pearl EDWARDS), DOB: XX-XX-1965 for evidence of violations of 21 U.S.C. §

841 (a)(1), Possession with Intent to Distribute Controlled Substances (heroin); 21 U.S.C. § 846, Conspiracy to Possess with Intent to Distribute Controlled Substances; and 18 U.S.C. § 1716, Mailing Injurious Articles.

3. Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that Jennifer EDWARDS (AKA: Jennifer Pearl EDWARDS), DOB: XX-XX-1965 committed violations of 21 U.S.C. § 841 (a) (1) Possession with Intent to Distribute Controlled Substances (heroin); 21 U.S.C. § 846, Conspiracy to Possess with Intent to Distribute Controlled Substances; and 18 U.S.C. § 1716 Mailing Injurious Articles.

#### SUMMARY OF INVESTIGATION

4. On May 5, 2022, Postal Inspectors interdicted a United States Postal Service Priority Mail large mailing box bearing Priority Mail tracking number 9505 5131 7911 2123 7126 72 (subject parcel) addressed to “S. Reynolds 15862 Ridgebrook Path, Romulus, MI 48174” with a listed return address of “Bradley S. 10232 Tanforan Dr. Cypress, CA 90630.” The parcel was mailed on May 3, 2022, from zip code 90630. Further, the parcel

weighed approximately 5 pounds, 3.70 ounces and bore \$31.25 in postage and fees.

5. A database used by the Postal Inspection Service revealed that the listed sender, Bradley S, had no known association with the listed origin address. A database used by the Postal Inspection Service revealed that the listed recipient, S. Reynolds, had no known association with the listed destination address.

6. On May 5, 2022, Postal Inspectors met United States Border Patrol (“USBP”) Agent Ryan Sprague. Agent Sprague brought a narcotics canine named “Myko” to the USPIS Allen Park Domicile located in Allen Park, MI. At approximately 1:00 PM, Postal Inspectors arranged a controlled substance detection test by placing the subject parcel in a lineup with similar parcels in an area at the USPIS Allen Park Domicile. Agent Sprague and K9 Myko were not present during the placement of the parcels in the test area. During the controlled substance detection test, Postal Inspectors observed Myko examine the area and alert only on the subject parcel by laying down in front of the Subject Parcel.

7. On May 6, 2022, I swore to and obtained federal search warrant 2:22-mc-50879-1. Postal Inspector Bradshaw and Inspector Nissen executed the search warrant and found the following items: a vacuumed sealed Ozark

Trail Cooler that contained a bubble mailer with a Priority Mail envelope, with a vacuumed sealed bundle that presumptively tested positive for the properties of heroin, weighing approximately 1,002.7 grams.

### CONTROLLED DELIVERY AND ANTICIPATORY SEARCH WARRANT

8. On May 9, 2022, an anticipatory warrant was obtained from the Honorable Elizabeth Stafford, United States Magistrate Judge, which authorized them to enter and search 15862 Ridgebrook Path address if the Subject Parcel entered the 15862 Ridgebrook Path residence.

9. Postal Inspectors and the United States Drug Enforcement Administration conducted a controlled delivery of the Subject Parcel. At the time of the controlled delivery, the Subject Parcel contained a bundle of sham narcotics fashioned to appear to be heroin and to simulate the Subject Parcel's original weight. An electronic device was also placed inside the subject parcel that would electronically alert agents and inspectors when the subject parcel was in motion and when it was opened.

10. On May 9, 2022, at approximately 1:46 PM, Postal Inspector Brown, acting in an undercover capacity as a USPS Mail Carrier, delivered the Subject Parcel to the 15862 Ridgebrook Path address to a black female later identified as EDWARDS. EDWARDS took possession of the Subject

Parcel and took it into the Ridgebrook Path address, which activated the triggering component of the anticipatory search warrant. Postal Inspectors and the DEA kept surveillance in case any unknown suspects arrived at the Ridgebrook Path address to retrieve the subject parcel.

11. At approximately 4:30 PM, Postal Inspectors and the DEA approached the Ridgebrook Path address, knocked and announced, identifying themselves as law enforcement and announcing they had a search warrant. EDWARDS refused to open the door. Postal Inspectors and the DEA breached the door and executed the anticipatory search warrant. During the entry, EDWARDS attempted to block law enforcement from clearing the upstairs portion of the residence. EDWARDS was escorted away from the staircase for the residence to be cleared for officer safety.

12. After the residence was cleared, I and DEA TFO Janowicz read Edwards her Miranda Rights on IS Form 1067 Advice of Rights. Edwards stated she understood her rights by initialing her rights and requested an attorney. During the search, I and TFO Janowicz obtained verbal and written consent to examine EDWARDS's phone. A review of the contacts listing revealed a contact listed as "Darrell City'Neff 0185" (HOLCOMB). The contact was listed in EDWARDS' phone as having a birthdate of September 9, 1991, which is HOLCOMB's birthdate. While examining EDWARDS'

phone, officers observed a picture of the subject parcel delivered to the Ridgebrook Path address earlier that day. EDWARDS texted the picture of the Subject Parcel to HOLCOMB at 2:01PM. EDWARDS' call log revealed a Facetime call with HOLCOMB at approximately the same time.

#### FORENSICS SEARCH OF CELL PHONE

13. As noted in the above paragraph 11, EDWARDS verbally and in writing consented to a search her phone. The phone was seized and sent to the United States Postal Inspection Service National Forensics Laboratory. The phone was forensically examined using Greykey. A review of the forensics exam revealed the cell phone had a listed username of Jennifer EDWARDS iPhone.

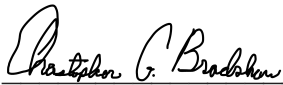
14. Further review of the phone revealed parcel images from FEDEX and USPS addressed to the Ridgebrook Path address. For example, an image revealed a brown mailbox bearing USPS Priority Mail tracking number 9505 5163 3004 1067 6320 53 addressed to "Peter A. 15862 Ridgebrook Path Romulus, MI 48174," with a return address of "James L. 10469 Gregory Circle. Cypress, CA 90630." The parcel was mailed on March 8, 2021 and weighed approximately 24 pounds. Further the parcel had \$87.90 in postage in fees.

15. The same databased used in paragraph 5 revealed that James L, had

no known association with the listed origin address. The same database revealed Peter A. had no known association with the listed destination address.

### CONCLUSION

16. Based upon the foregoing, I believe that Jennifer EDWARDS (AKA: Jennifer Pearl EDWARDS), DOB: XX-XX-1965 knowingly received the subject parcel, which contained grams of 1,031.7 grams of heroin, via the United States Postal Service. I therefore have probable cause to believe that Jennifer EDWARDS (AKA: Jennifer Pearl EDWARDS), DOB: XX-XX-1965 committed violations of 21 U.S.C. § 841 (a)(1) Possession with Intent to Distribute Controlled Substances (heroin); 21 U.S.C. § 846, Conspiracy to Possess with Intent to Distribute Controlled Substances; and 18 U.S.C. § 1716, Mailing Injurious Articles. Accordingly, I respectfully request that this Court issue a complaint and arrest warrant.



Christopher G. Bradshaw  
Postal Inspector

Subscribed and sworn to before me, this 14 day of March, 2023.



Hon. Elizabeth A. Stafford  
United States Magistrate Judge  
Eastern District of Michigan  
Detroit, Michigan